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Monday, March 24, 2025

**Via Electronic Filing**

Hon. Andrew E. Krause, U.S.M.J.  
The Hon. Charles L. Brieant Jr. Federal Building and United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601-4150

Re: Request for order granting Defendants' Motion for Alternative Service on Matthew Tyrmand (ECF No. 101)  
Case No.: 7:23-cv-04533  
*Project Veritas, et al. v. James O'Keefe, et al.*

Dear Judge Krause:

I write on behalf of Defendants James O'Keefe and Transparency 1, LLC d/b/a O'Keefe Media Group ("Defendants") in the above-referenced matter to respectfully request that the Court enter an order granting Defendants' Motion for Substituted Service on Third Party Matthew Tyrmand and Memorandum in Support (ECF No. 101 and 102) currently pending before the Court.

Plaintiffs Project Veritas and Project Veritas Action Fund ("Plaintiffs") have indicated in two separate court filings (ECF. 106 and 138), as well as before the Court at the Status Conference on March 10, 2025, that they do not object to Defendants' request for alternative service on Matthew Tyrmand (ECF. 106 and 138). Given Plaintiffs' non-opposition, Defendants respectfully submit that an order granting their Motion for Alternative Service on Matthew Tyrmand (ECF No. 101) is appropriate and will serve judicial efficiency by resolving the matter without further delay.

Should the Court require any further submissions or have any questions, we remain available to provide any information the Court may need. We appreciate the Court's time and consideration of this request.

Regards,

A handwritten signature in black ink, appearing to read "Nick Whitney". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Nick Whitney, Esq.

cc: all counsel of record via CM/ECF